

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**FILED**  
CHARLOTTE, NC

NOV 09 2009

U.S. DISTRICT COURT  
WESTERN DISTRICT OF NC

Jerry L. Ross Jr – Plaintiff

Vs

Gordon and Weinberg, P.C.  
21 South 21<sup>st</sup> street  
Philadelphia, PA 19103

And

Unifund CCR Partners  
10625 Techwoods Circle  
Cincinnati, Ohio 45242

Civil Complaint

Docket# 3:09cv482

Jury Trial Demanded

**Brief Summary and Jurisdiction**

The defendants Gordon & Weinberg, P.C. are acting under authority or color of state law. Unifund CCR Partners is a debt collector that is acting under authority or color of state law. Both defendants, with full knowledge of the plaintiff's address (Jerry L. Ross Jr 10400 John price Road lot# 90 Charlotte, N.C. 28273), conspired together and viciously attacked the plaintiff's family by having a judgment served at the address of the plaintiff's father 580 miles away from Charlotte, N.C. Both defendants conspired together a more devious plan. The defendants filed a lien against the plaintiff's father's home and destroyed his father's credit report. By serving the plaintiff's father with full knowledge of the plaintiff's address, the plaintiff couldn't defend himself against the claim set forth. The plaintiff was deprived of his right to a fair trial. In addition, the defendants' cause of actions violated various civil rights in pursuant to rules 42 U.S.C. 1983, 1985, 15 U.S.C. § 1692 1692p [ Fair debt collections act ], 15 U.S.C. § § 1681-1681v [Fair credit reporting act], 18 U.S.C. § 2510 See ACLU Vs Ashcroft (2004) [Electronics communications act of 1986], 5 U.S.C. § 552a [Privacy act of 1974], 18 U.S.C. § 1961-1968 Chapter 45 [Fraud and False Statements] and Chapter 65 [Malicious Mischief], Article IV, section 1 of the U.S.C. [Full faith and credit clause] 28 U.S.C. § 1738 see Allstate Vs Hague 449 U.S. 302(1981) and 18 U.S.C. § 1001( False statements).

**Jurisdiction cont'd**

This is an action under the Fair debt collection practices act, hereinafter "FDCPA" 15 U.S.C. § 1692a, et seq., FCEUA, 73 Pa. C.S. § 2270.1 et seq., "FCEUA" and for common law fraud. Jurisdiction in this case is founded upon 15 U.S.C. 1692K. This

grants the federal district without regard to the amount controversy. This court has jurisdiction over case as an adversary proceeding to rules 28 U.S.C. § § 157, 1334 and 11 U.S.C. § 523. This is a core rule proceeding under 28 U.S.C. § 157 (b) (2) (o) and 42 U.S.C. 1983, 1985.

## **Complaint**

1. Defendant #1 Unifund CCR Partners purchased a debt from Citibank National Association South Dakota (examine exhibit #7). Unifund had full knowledge of the plaintiff's address (examine exhibit#5) and hires defendant #2 (Gordon & Weinberg, P.C.) to file a judgment against the plaintiff's family's home on 1-10-06 580 miles away from Charlotte N.C. (examine exhibit#1) The plaintiff hasn't resided at his parents' home since February 16, 1997. RE: Defamation of character , slander , verbal abuse , mental abuse , Intentional affliction of emotional distress , negligence , gross negligence , neglectant conduct , outrageous conduct , fraudulent conduct , fraudulent filing , harassment , abuse of authority , collections under false pretense , devious deception , violation of the fair debt collection practices act , invasion of privacy and the privacy act of 1974.

2. The defendants were so negligent and careless in their research, they didn't see that the plaintiff was residing in Charlotte N.C. for the past 13 years (examine exhibit#5) (Drivers license, mortgage, utilities, tax returns ect. will be presented at trial). Furthermore, the defendants were so negligent and careless they didn't see and care the signature on the judgment was the plaintiff's father (Jerry L. Ross Sr) who resides in Glenside PA. (Examine exhibit#1). This course of action is negligent for the simple fact that a judgment must be served at a valid address which is not in Glenside PA. (Examine exhibit #1 and #5). RE: count 2 negligence, count 2 neglectant conduct, unsworn falsifications to authorities, count 2 outrageous conduct, count 2 abuse of authority, count 2 mental abuse, count 2 Intentional affliction of emotional distress and violation of the fair debt collections practices act.

3. The defendants with full knowledge of the plaintiff's present address (examine exhibit#5) filed in the court of common pleas Montgomery County, Norristown, Pa 19406 (Examine exhibit#3). The plaintiff had no possible way to defend against the claim set forth. RE: Violation of right to a fair trial, 18 Pa, C.S.A. section 4909 relating to unsworn falsifications to authorities; **Perjury** (examine exhibit#6). 18 U.S.C. § 1961-1968 chapter 45 [fraud and false statements] and chapter 65[malicious mischief], count 2 collections under false pretense, count 2 slander, count 2 verbal abuse, count 3 mental abuse, count 2 fraudulent filing, count 3 outrageous conduct, count 3 neglectant conduct, count 3 abuse of authority and count 3 Intentional affliction of emotional distress.

4. The defendants with devious intent had a lien placed upon the plaintiff's father's home nearly causing the loss of his property (examine exhibit#4). Furthermore, the fraudulent judgment was placed upon the plaintiff's father's credit report, destroying his credit. RE: counts 3 & 4 defamation of character, counts 3 & 4 slander, counts 3 & 4 negligence,

counts 3 & 4 harassment, counts 3 & 4 verbal abuse, counts 3 & 4 collections under false pretense, counts 2 & 3 devious deception, counts 4 & 5 abuse of authority, counts 4 & 5 outrageous conduct, count 4 mental abuse, count 4 neglectant conduct, count 2 fraudulent filing, identity theft, 18 U.S.C. § 1961-1968 chapter 95 [ racketeering ], attempted theft by deception, 15 U.S.C. §§ 1681-1681v [ fair credit report act ], 18 U.S.C. § 2510 [ Electronic communication privacy act of 1986], 5 U.S.C. § 552a [ privacy act of 1974] and count 4 Intentional affliction of emotional distress.

5. The defendants reported the judgment on the plaintiff's credit report. The plaintiff was never served a judgment and still resides in Charlotte N.C. RE: count 5 defamation of character, count 5 slander, count 5 verbal abuse, count 5 mental abuse, count 5 negligence, count 5 neglectant conduct, count 5 harassment, count 6 abuse of authority, count 4 devious deception, count 3 fraudulent filing, count 5 collections under false pretense, count 6 outrageous conduct, 15 U.S.C. 1692-1692p [ fair debt collections practices act], 18 U.S.C. § 2510 see ACLU Vs. Ashcroft (1981) [electronics communications privacy act of 1986], 5 U.S.C. § 552a [privacy act of 1974], 18 U.S.C. § 1961-1968 Chapter 45 [fraud and false statements] and Chapter 65 [malicious mischief], 15 U.S.C. §§ 1681-1681v [fair credit reporting act], count 5 Intentional affliction of emotional distress.

6. The defendants continued their devious plan by serving a garnishment where the plaintiff's father does his banking (examine exhibit#8). The plaintiff has no checking or savings account at PNC bank. RE: count 6 defamation of character, count 6 slander, count 6 verbal abuse, count 6 mental abuse, count 6 negligence, count 6 neglectant conduct, count 6 harassment, count 7 abuse of authority, count 5 devious deception, count 6 collections under false pretense, count 7 outrageous conduct, 15 U.S.C. 1692-1692p [fair credit collections practices act], count 4; 5 U.S.C. § 552a [privacy act of 1974], count 4; 18 U.S.C. § 1961-1968 Chapter 65 [malicious mischief], count 4 fraudulent filing, count 6 Intentional affliction of emotional distress.

7. The defendants acted with strong disregard and disrespect for the federal government's laws, rules and regulations. In addition to disrespect for the United States Constitution, the defendants continue to harass the plaintiff's family through the United States mail service (examine exhibit#9) Re: Count 7 mental abuse, count 7 neglectant conduct, count 8 outrageous conduct, count 7 collections under false pretence, count 7 Intentional affliction of emotional distress, count 5; 5 U.S.C. § 552a [privacy act of 1974], count 5; 18 U.S.C. § 1961-1968 Chapter 65 (malicious mischief).

## **Conclusion**

Although Unifund does not hold a license to practice law, Unifund appeared in this case as a witness and may indeed routinely appear in many of Gordon & Weinberg's cases before the court of common pleas of Montgomery County, Norristown PA. The defendants may also appear in other state courts and moves them for wage orders.

No motion for wage order was ever served upon the plaintiff, even though Gordon & Weinberg **swore under oath** that the same was served (examine exhibit 2 under dockets seq 2 filing date 1/12/06). ( 18 U.S.C. § 1001; False statements)

Defendants Unifund and Gordon & Weinberg, P.C. conspired and carried through with a fraudulent scheme to defraud the plaintiff out of \$15,982.63 by adding bogus charges to the Montgomery County District Justice judgment originally in the amount of \$7852.76 (examine exhibit # 5 & # 10).

Gordon & Weinberg's actions constituted a "legal action" prohibited by 15 § 1692i.

Upon information received, Unifund and other of the above defendants herein have acted to conspire to defraud multiple unsuspecting judgment debtors out of thousands of dollars and as such, the said actions as stated herein above are not bona fide errors or unintentional conduct.

Federal courts have the general equity authority and the power to restrain future conduct.

Given the past conduct of defendants, there is a strong likelihood that such will be repeated.

This court is requested to enjoin all defendants from enforcing this debt.

This court is further requested to sanction Gordon & Weinberg for the fraudulent practice of law and to enjoin future conduct of a similar nature.

The defendants are therefore **guilty of perjury**, and as such have violated §§ 1692d, 1692f as well as the "FCEUA" along with other serious violations.

Defendants' actions amount to common law fraud upon the plaintiff.

Defendants' actions in this case were malicious, fraudulent, outrageous and hence entitled the plaintiff to severe punitive damages.

### **Request For Relief**

Defendant #1 (Gordon & Weinberg, P.C. 21 South 21<sup>st</sup> Street Philadelphia, PA 19103) is responsible for damages for the following counts presented in this complaint.

Violation of right to a fair trial, Violation of the fair credit collections practices act ( **3 counts**), Violation of the fair credit reporting act ( **2 counts** ), Violation of the privacy act of 1974 ( **5 counts** ), Violation of the full faith and credit clause, malicious mischief ( **5**

**counts** ), Defamation of character ( **6 counts** ), Slander ( **6 counts** ), Negligence ( **6 counts** ), Gross Negligence, Neglectant Conduct ( **7 counts** ), Intentional affliction of emotional distress ( **6 counts** ), Outrageous Conduct ( **8 counts** ), fraud, Common law fraud, Fraudulent Conduct, Fraudulent Filing ( **3 counts** ), unprofessional conduct, Harassment ( **7 counts** ), Harassment by U.S. Mail, Collections under false pretense ( **7 counts** ), Mental Abuse ( **7 counts** ), Mental Anguish, Devious Deception ( **5 counts** ), Verbal Abuse ( **6 counts** ), Abuse of Authority ( **8 counts** ), Identity theft, Malpractice, Violation of the electronics communications privacy act of 1986 ( **2 counts** ), Unsworn falsifications to authorities ( **2 counts** ), Malicious Prosecution, Invasion of Privacy, 18 U.S.C. § 1961 – 1968 [ Racketeering ], Violation on FCEUA and 18 U.S.C. § 1001.

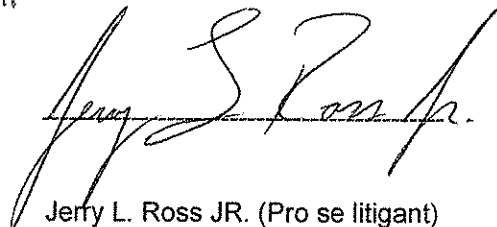
In addition, Defendant # 1 is responsible for fraudulently false reporting to the credit bureau. The defendant # 1 (Gordon & Weinberg) is responsible for each credit inquiry presented on the credit reports of the plaintiff and his father from the first day the fraudulent judgment appears to present. The following are additional counts for each inquiry presented: (Defamation of character, Slander, Verbal abuse, Intentional Affliction of emotional distress, Malicious Mischief, Negligence, Violation of the fair credit reporting act, mental abuse, Abuse of authority, Harassment, Invasion of privacy, Fraud, Fraudulent conduct, False statements, Neglectant Conduct, Outrageous conduct, Devious deception, Identity theft and Violation of the Electronics communications act of 1986).

Defendant #2 Unifund CCR partners (10625 Techwoods Circle Cincinnati, Ohio 45242) is responsible for neglectant hiring and conspiracy of all counts caused by defendant # 1.

The plaintiff request for judgment separately and severally against the defendants herein for: Actual damages, statutory damages, monetary damages, damages under FDCPA compensatory damages, Punitive damages, for 3 times the actual damages for each count presented in this complaint, for an injunction against future conduct as enumerated herein and such other relief that the court feels is just and proper.

Mecklenburg  
County, North Carolina  
October 5, 2009  
2009  
Jerry L. Ross  
My Commission Expires October 5, 2011

Respectfully Submitted



Jerry L. Ross JR. (Pro se litigant)  
10400 John Price Rd Lot #90  
Charlotte, N.C. 28273  
(704) 264-2127 – Home  
(704) 891-2044 – cell

cc: The Federal Prosecutors' office  
(U.S. Attorney's office)  
And  
Federal Bureau of Investigation  
601 4<sup>th</sup> Street NW  
Washington, D.C. 20535



Exhibit 1

# MONTGOMERY COUNTY SHERIFF'S DEPARTMENT

## ORDER FOR SERVICE

Please prepare a separate request for service form for each defendant to be served by the Sheriff - Please Type or Print


To: Sheriff John P. Durante  
 Montgomery County Courthouse  
 P.O. Box 311  
 Norristown, PA 1904-0311  
 Phone: 610-278-3331

Date: 1/5/06

Prothonotary No. 06-00051

Sheriff's Cost: 43.00

Fax: 610-278-3832

Attorney, Or Plaintiff's Name and Address: <b>FREDERIC I. WEINBERG</b> <b>GORDON &amp; WEINBERG, P.C.</b> 21 South 21 <sup>st</sup> Street Philadelphia, PA 19103  ATTY I.D.: 41360      PHONE :215-988-9600	<input checked="" type="checkbox"/> <b>Civil Action Complaint</b> <input type="checkbox"/> <b>Confess Judgment</b> <input type="checkbox"/> <b>Complaint in Ejectment</b> <input type="checkbox"/> <b>Posting</b> <input type="checkbox"/> <b>Writ of Possession</b>  Other: _____	<b>Writ of Execution Levy</b> <b>Writ of Execution Attach.</b> <b>Writ of Execution Garnish</b> <b>Writ of Seizure</b> <b>Impoundment</b> <b>Court Order</b>
<b>UNIFUND CCR PARTNERS ET AL.</b>  <div style="text-align: center;">VS.      PLAINTIFF(S)</div> <b>JERRY L. ROSS, JR.</b>  <div style="text-align: center;">DEFENDANT(S)</div> <b>JERRY L. ROSS, JR.</b>	<div style="display: flex; justify-content: space-between;"> <b>FOR SHERIFF USE ONLY</b> <b>SHERIFF'S RETURN</b> </div> PERSON SERVED <u>JERRY L. ROSS SR</u> RELATIONSHIP/POSITION <u>FATHER</u> PLACE OF SERVICE <u>AS GIVEN</u> DATE OF SERVICE <u>1-10-06</u> TIME OF SERVICE <u>1110</u> NUMBER OF ATTEMPTS <u>1</u> DEPUTY <u>Bow</u>	
<b>SERVICE UPON:</b> <b>LOCATION (MUST HAVE VALID ADDRESS OR DIRECTIONS):</b>  2636 ARNAUD AVENUE GLENSIDE, PA 19038	 2006-00051-0002 1/12/2006 3:43:47 PM Served William E. Donnelly Montgomery County Prothonotary	
<b>SERVICE NOT MADE</b>		
DATE: _____	TIME: _____	DEPUTY: _____
NO SERVICE	BAD ADDRESS	UNKNOWN AT ADDRESS
MOVED	BUILDING VACANT	ADDRESS OUT OF COUNTY
<b>POSSESSION TAKEN:</b>		
DATE: _____	TIME: _____	DEPUTY: _____
ATTEMPTED SERVICE DATE & TIME		

RECEIVED  
 SUPERVISOR APPROVAL

Exhibit 2

[Back to Search](#) > [Results](#) > Case #2006-00051

Case Details	
Case Number	2006-00051
Commencement Date	1/3/2006
Case Type	Complaint Civil Action
PFA Number	
Caption Plaintiff	UNIFUND CCR PARTS
Caption Defendant	ROSS, JERRY L JR
Lis Pendens Indicator	No
Status	4
Judge	CARPENTER
Parcel Number	
Remarks	
Sealed	0

**Plaintiffs**

Name	Address	Country	Counsel	Co-Counsel	Notify	Sequence
UNIFUND CCR PARTS	10625 TECHWOODS CIRCLE CINCINNATI, OH 45242		WEINBERG, FREDERIC I		Yes	1
CITIBANK	10625 TECHWOODS CIRCLE CINCINNATI, OH 45242		WEINBERG, FREDERIC I		Yes	2

**Defendants**

Name	Address	Country	Counsel	CoCounsel	Notify	Sequence
ROSS, JERRY L JR	2636 ARNAUD AVE GLENSIDE, PA 19038				Yes	1

**Garnishees**

Name	Address	Country	Attorney	Notify
PNC BK	101 S EASTON RD GLENSIDE, PA 19038 UNITED STATES	UNITED STATES		Yes

**Dockets**

Seq.	Filing Date	Docket Type	Docket Text	Sealed
0	1/3/2006	Complaint Civil Action		0
1	1/3/2006	Cover Sheet		0
2	1/12/2006	(Internal Use Only) Served	JERRY L ROSS JR ON 1/10/06	0
3	2/28/2006	Judgment Entered in Favor of	PLTFS AND AGAINST DEFT FOR \$14,855.70	0
4	2/28/2006	Notice 236 / Judgment Req Doc Mailed		0
5	2/28/2006	Affidavit of Non-Military Service		0
6	11/29/2007	Prae For Execution and Writ Issued with Garnishee		0
7	11/29/2007	Interrogatories To	PNC BK	0
8	12/10/2007	(Internal Use Only) Served	PNC BANK ON 12/7/07 GRNSH	0
9	1/22/2008	Answer to Interrogatories By	PNC BK	0

**Judgments**

Plaintiff	Defendant	Date	Amount
UNIFUND CCR PARTS	ROSS, JERRY L JR	3/2/2006	14,855.70

**Archive Locations****Linked Cases**

Copyright © 2008 Paperless Solutions, Inc. All rights reserved.

Exhibit 3

2021984

THIS IS AN ARBITRATION MATTER.  
ASSESSMENT OF DAMAGES HEARING REQUIRED.

GORDON & WEINBERG, P.C.  
BY: FREDERIC I. WEINBERG, ESQUIRE  
Identification No.: 41360  
PAUL M. SCHOFIELD, JR., ESQUIRE  
Identification No.: 81894  
21 SOUTH 21ST STREET  
PHILADELPHIA, PA 19103  
215/988-9600

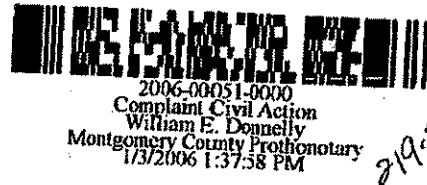
UNIFUND CCR PARTNERS ASSIGNEE COURT OF COMMON PLEAS  
OF CITIBANK UNIVERSAL CARD SVCS MONTGOMERY COUNTY

10625 Techwoods Circle  
Cincinnati, OH 45242

vs.

DOCKET NO. :

JERRY L ROSS JR  
2636 ARNAUD AVE  
GLENESIDE PA 19038



NOTICE

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

MONTGOMERY COUNTY LAWYER REFERENCE SERVICE  
100 WEST AIRY STREET  
NORRISTOWN, PA 19401  
(610) 279-9660



Exhibit 4

GORDON & WEINBERG, P.C.  
BY: FREDERIC I. WEINBERG, ESQUIRE  
Identification No.: 41360  
PAUL M. SCHOFIELD, JR., ESQUIRE  
Identification No.: 81894  
21 SOUTH 21ST STREET  
PHILADELPHIA, PA 19103  
215/988-9600

UNIFUND CCR PARTNERS ASSIGNEE OF  
CITIBANK UNIVERSAL CARD SVCS

COURT OF COMMON PLEAS  
MONTGOMERY COUNTY

vs.

DOCKET NO. : 2006-000

JERRY L ROSS JR  
2636 ARNAUD AVE  
GLENSIDE PA 19038

and

PNC Bank  
101 South Easton Rd  
Glenside, PA 19038

**GARNISHEE**

**WRIT OF EXECUTION**  
**NOTICE**

This paper is a Writ of Execution. It has been issued because there is a judgment against you. It may cause your property to be held or taken to pay the judgment. You may have Legal rights to prevent your property from being taken. If you wish to exercise your rights, you must act promptly.

The law provides that certain property cannot be taken. Such property is said to be exempt. There is a debtor's exemption of \$300.00. There are other exemptions which may be applicable to you. Attached is a summary of some of the major exemptions. You may have other exemptions or other rights.

If you have an exemption, you should do the following promptly: (1) Fill out the attached exemption claim form and demand for a prompt hearing; (2) Deliver the form or mail it to the Sheriff's Office at the address noted.

You should come to court ready to explain your exemption. If you do not come to court and prove your exemption, you may lose some of your property.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

MONTGOMERY COUNTY LAWYER REFERENCE SERVICE  
100 WEST AIRY STREET  
NORRISTOWN, PA 19401  
(610) 279-9660

07 NOV 29 AM 11:22  
OFFICE OF THE  
PROTHONOTARY  
MONTGOMERY COUNTY, PA

**Your AT&T Universal Card Statement**

December 16 - January 17, 2003



Page 1 of 3

**JERRY ROSS**

Account 5491 1303 5543 6320

Calling Card + PIN

No Annual Fee/Platinum Card

**How To Reach Us**Visit: [www.universacard.com](http://www.universacard.com)

Customer Service: 1 800 423-4343 or write

Cardmember Services, PO Box 44167  
Jacksonville, FL 32231-4167**Quick Reference**Minimum Payment Due..... \$7,852.76  
Due Date..... February 11, 2003  
\*Payment must be received by 1:00 pm local time on the payment due date.Amount Past Due..... \$1,032.89  
Amount Over Limit..... \$782.76Credit Line..... \$7,090.00  
Available Credit..... \$0.00  
Cash Advance Limit..... \$500.00  
Available Cash Advance Limit..... \$0.00**Account Summary**

Previous Balance	7,669.48
Payments and Adjustments	0.00
MasterCard® Activity	29.00
Total AT&T Services	0.00
New Balance	\$7,852.76

Note: Detailed activity starts on page 3.

Help is available! Please call the toll-free number shown above to learn about our special payment options. Please give us the opportunity to assist you.

**Payment Record**    Amount Paid: \_\_\_\_\_    Date Paid: \_\_\_\_\_    Check Number: \_\_\_\_\_

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05491130355436320785276999995608

Your Account Number

5491 1303 5543 6320

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
FEB 11 2003Your Total Balance  
\$7852.76Minimum Amount Due  
\$7852.76

\$

6498 NC 32 A L AR7050959

JERRY ROSS  
 LOT 90  
 10400 JOHN PRICE RD  
 CHARLOTTE NC 28273-4547

AT&T UNIVERSAL CARD  
 P.O. BOX 8112  
 S HACKENSACK, NJ 07606-8112

VERIFICATION

FREDERIC I. WEINBERG, ESQUIRE, hereby states that he is the attorney for the Plaintiff(s) in this action and verifies that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief.

The undersigned understands that the statements herein are made subject to the penalties of 18 Pa.C.S.A. Section 4904 relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
FREDERIC I. WEINBERG, ESQUIRE

Exhibit 7  
2021984

**AFFIDAVIT OF INDEBTEDNESS**

State of Ohio )  
County of Hamilton ) ss.

Kim Kenney being sworn, deposes and says that she is Media Supervisor of Unifund CCR Partners herein called assignee, which is doing business at 10625 Techwoods Circle, Cincinnati, Ohio 45242 and that she is authorized to make the statements and representations herein.

The defendant is not in any branch of the military.

There is due and payable from Jerry L. Ross Jr, Account Number 5491130355436320, the amount of \$13500.90 (principal balance in the amount of \$7852.76 plus interest up through 09/02/2005 in the amount of \$5648.14). By the terms of the agreement between the defendant and the original creditor, interest is accruing from the aforesaid date at the rate of 25.00 percent per annum. This balance reflects any payments, credits or offsets made since the account was charged off.

Citibank (South Dakota) National Association's account was issued under the name of Citibank Universal Card Svcs. Unifund CCR Partners purchased this account from Citibank (South Dakota) National Association. Said account has been referred to Gordon & Weinberg P.C. with full power and authority to do and perform all acts necessary for the collection, settlement, adjustment, compromise or satisfaction of said claim.

DATED this September 2, 2005

Kenney

UNIFUND CCR PARTNERS

By: Kim Kenney  
Media Supervisor

10625 Techwoods Circle Cincinnati, OH 45242  
Address

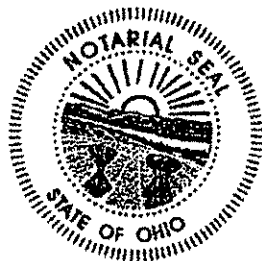
Subscribed and sworn to before me this 2 day of September, 2005  
Year

K. Williams

Notary Public

My commission Expires

Client # 829



KAREN WILLIAMS  
NOTARY PUBLIC  
STATE OF OHIO  
Comm. Expires  
July 19, 2010

GORDON & WEINBERG, P.C.  
 BY: FREDERIC I. WEINBERG, ESQUIRE  
 Identification No.: 41360  
 PAUL M. SCHOFIELD, JR., ESQUIRE  
 Identification No.: 81894  
 21 SOUTH 21ST STREET  
 PHILADELPHIA, PA 19103  
 215/988-9600

UNIFUND CCR PARTNERS ASSIGNEE OF  
 CITIBANK UNIVERSAL CARD SVCS

COURT OF COMMON PLEAS  
 MONTGOMERY COUNTY

vs.

DOCKET NO. : 2006-000

JERRY L ROSS JR  
 2636 ARNAUD AVE  
 GLENSIDE PA 19038

and

PNC Bank  
 101 South Easton Rd  
 Glenside, PA 19038

**GARNISHEE**

**WRIT OF EXECUTION**

TO THE SHERIFF OF MONTGOMERY COUNTY:

To satisfy the judgment, interest and costs against:

JERRY L ROSS JR

defendant(s)

- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's(s) interest therein:

You are also directed to attach the property of the defendant(s) not levied upon in the possession of

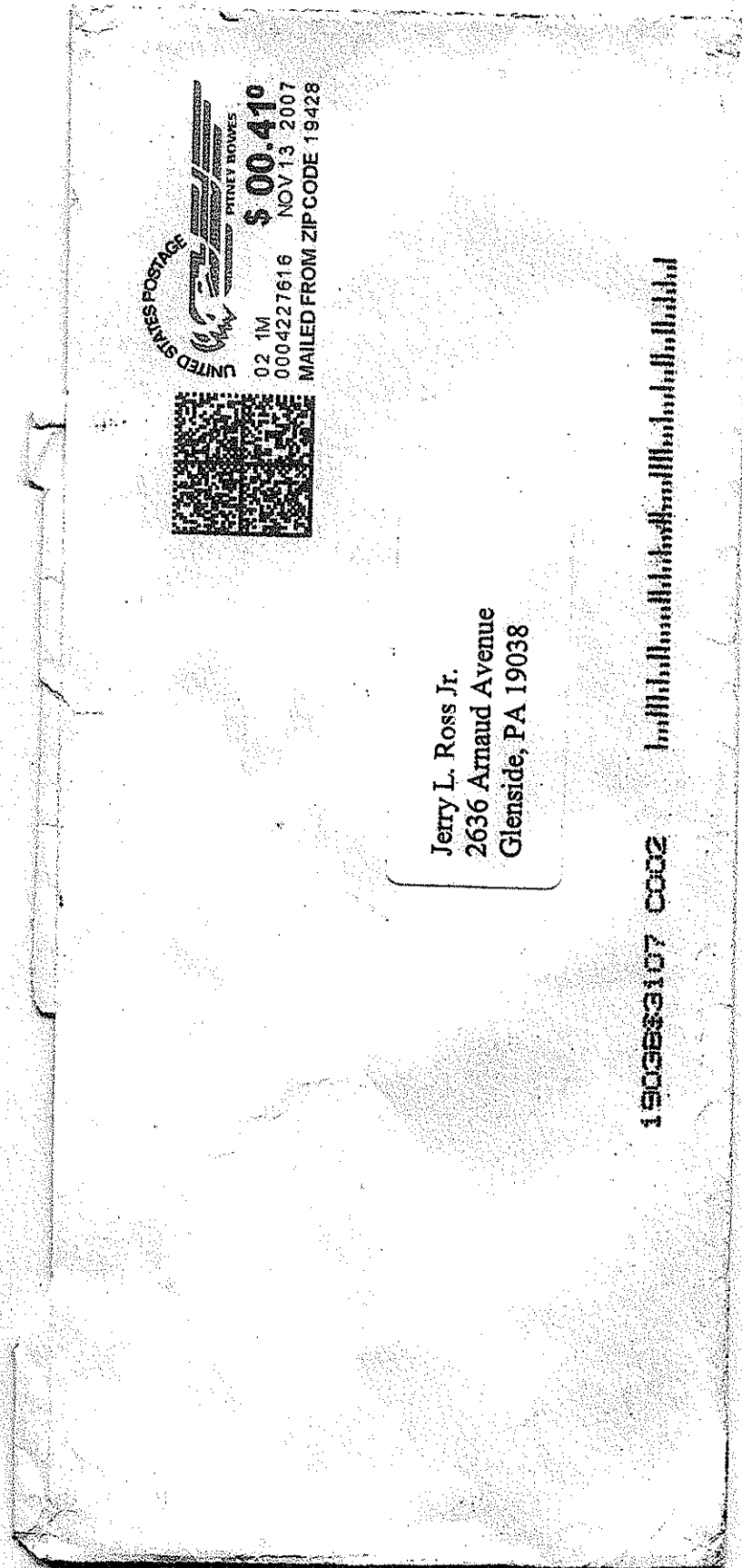
PNC Bank  
 101 South Easton Rd  
 Glenside, PA 19038- **GARNISHEE**

(specifically describe property)

and to notify the garnishee(s) that (a) an attachment has been issued: (b) the garnishee(s) is(are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof.



Exhibit #9



- (2) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee(s), you are directed to notify him(them) that he(they) has(have) been added as garnishee(s) and is(are) enjoined as above stated.

AMOUNT DUE	\$14,855.70
INTEREST	
from February 28, 2006	\$1,044.43
COSTS	
Prothonotary fee	\$23.50
Sheriff fee	<u>\$59.00</u>
<b>TOTAL</b>	<b>\$15,982.63</b>

Prothonotary

BY:

*William E. Dancy*  
*Stuenkel*  
Clerk

DATE:

*11/29/07*